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Attorneys for Mark Buttita, personal representative of Salvatore Buttita

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11

GENERAL MOTORS CORP., et al.,

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

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**EVIDENCE AND WITNESS LIST OF MARK BUTTITA, AS PERSONAL
REPRESENTATIVE OF SALVATORE BUTTITA FOR THE DEBTORS' MOTION
PURSUANT TO 11 U.S.C. §§105, 363(b), (f), (k), and (m), AND 365 AND FED R. BANKR. P.
2002, 6004, AND 6006, TO (I) APPROVE (A) THE SALE PURSUANT TO THE MASTER
SALE AND PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS
LLC, A U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS,
CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS; (B) THE ASSUMPTION
AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND
UNEXPIRED LEASES; AND (C) OTHER RELIEF; AND (II) SCHEDULE
SALE APPROVAL HEARING**

Mark Buttita ("Buttita"), personal representative of Salvatore Buttita, through his
undersigned as undersigned counsel, Counsel & Drysdale, Chartered, by way of evidence and
witness list for the Debtors' Motion Pursuant to 11 U.S.C. §§105, 363(b), (f), (k), and (m), and

365 and Fed R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear Of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing (the "Sale Motion"), hereby states:

I. WITNESSES

Buttita may call as adverse witnesses Frederick Henderson, CEO of General Motors Corp. ("GM") and Harry Wilson of the U.S. Auto Task Force, live or by deposition. Buttita reserves the right to cross-examine witnesses called live or declaration or affidavit by the Debtors or any other party. Buttita also reserves the right to amend or supplement this list upon review of discovery responses just now being provided, or otherwise should the need present itself.

II. EXHIBITS

Buttita may use the Affidavit of Frederick Henderson (Docket No. 21) and any amendments or supplements thereto, the Master Transaction Agreement and any of the documents contained on the Debtors' exhibit list at the hearing on the Sale Motion.

On June 24, 2009, the Debtors produced hundreds of thousands of pages of documents and the U.S. Auto Task Force produced thousands of pages of documents. Buttita reserves the right to amend or supplement this list after his counsel have had an opportunity to review such documents.

III. DEPOSITION DESIGNATIONS

The depositions of Michael Raleigh of GM, Frederick Henderson of GM and Harry

Wilson of the U.S. Auto Task Force have been or are scheduled to be conducted on June 27, 28 and 29 respectively. Buttita reserves the right to designate all or portions of the transcripts of such depositions.

Dated: June 29, 2009
New York, NY


CAPLIN & DRYSDALE, CHARTERED

By: _____
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